



June 3, 2022

**(COURTESY COPY VIA ELECTRONIC MAIL)
VIA ECF**

Honorable John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
500 Pearl Street
New York, NY 10007-1312

*Re: North America Photon Infotech, Ltd. v. ZoomInfo LLC
Civil Action No. 1:20-cv-2180-JPC*

Dear Judge Cronan:

This firm represents Defendant and Counterclaim-Plaintiff ZoomInfo LLC (“ZoomInfo”) in the above-referenced action. We write pursuant to Your Honor’s Individual Rule 4(B) to seek this Court’s approval to seal and redact certain portions of ZoomInfo’s pretrial filings involving:

- Exhibit A (Declaration of Samantha Montgomery) and Exhibit B (Declaration of Josh Simon) to Defendant and Counterclaim-Plaintiffs ZoomInfo LLC’s Witness List;
- Defendant and Counterclaim-Plaintiffs ZoomInfo LLC’s Proposed Exhibit List; and
- ZoomInfo LLC’s Pretrial Memorandum of Law

Pursuant to Individual Rule 4(B)(i), counsel for the parties met and conferred concerning sealing on June 1. Highlights of the proposed redactions are being emailed to Your Honor’s chambers in connection with this filing as required by Individual Rule 4(B)(ii).

The materials that ZoomInfo requests be sealed involve both parties’ information. ZoomInfo seeks to redact and keep under seal its information, which relates to its monitoring practices to protect against data misuse and confidential pricing information concerning its services. This information is not known to the public and its disclosure could be used by third parties to gain an unfair advantage against ZoomInfo if they were to gain access to and use this commercially sensitive and/or proprietary information. ZoomInfo believes that there are no less restrictive alternatives available to prevent the defined and serious injury that could occur to it should ZoomInfo’s information be disclosed.

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It is therefore requested that ZoomInfo's request for sealing be granted.

Respectfully submitted,

/s/ Oren J. Warshavsky

Oren J. Warshavsky

cc: Michael P. Pappas, Esq. (via ECF and Electronic Mail)

The request to seal the unredacted documents and file the
redacted versions publicly is granted.

SO ORDERED.

Date: June 14, 2022

New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN
United States District Judge